

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Self Initiated Inspection

B707449488

FACILITY: Component Solutions		SRN / ID: B7074
LOCATION: 2219 10TH AVE, MENOMINEE		DISTRICT: Upper Peninsula
CITY: MENOMINEE		COUNTY: MENOMINEE
CONTACT: Scott Hancock , Manufacturing Supervisor		ACTIVITY DATE: 06/12/2019
STAFF: Michael Conklin	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Inspection to determine compliance with Michigan Air Pollution Control Rules.		
RESOLVED COMPLAINTS:		

**Facility: Component Solutions (SRN: B7074)**

**Location: 2219 10<sup>th</sup> Ave, Menominee, MI**

**Contact: Scott Hancock, Plant Manager, 715-587-9556**

#### Regulatory Authority

*Under the Authority of Section 5526 of Part 55 of NREPA, the Department of Environment, Great Lakes, and Energy may upon the presentation of their card, and stating the authority and purpose of the investigation, enter and inspect any property at reasonable times for the purpose of investigating either an actual or suspected source of air pollution or ascertaining compliance or noncompliance with NREPA, Rules promulgated thereunder, and the federal Clean Air Act.*

#### Facility Description

Component Solutions is a planing mill that provides dimensioned wood products for customers. The company specializes in custom sawing, ripping, and planing. Species of wood components that are processed include but not limited to Red Oak, Cherry, Soft Maple, Mahogany, as well as hardwood lumber.

The facility utilizes a variety of machines for chopping, surfacing, ripping, and sawing. Wood waste is collected from all machinery via a pneumatic system that routes through a fabric filter collector (baghouse) to either a silo or truck trailers. Wood waste stored in the silo is used as fuel for the wood-fired boiler that provides heat for the plant primarily during winter months. Wood waste collected in the truck trailers is sold as product for paper mills or animal bedding. The facility also contains a natural gas-fired boiler that is used as a backup to the wood-fired boiler. The table below summarizes the emission units at this source.

Emission Unit ID	Description
EUWOODBOILER	Nordfab Systems wood-fired boiler and multicyclone with a maximum heat input capacity of 9.3 MMBtu/hr
EUNGBOILER	Kewanee Classic III natural gas-fired boiler with a maximum heat input capacity of 5.0 MMBtu/hr
EUPNEUMATICLINE	A pneumatic transfer system that transports wood waste collected from process operations to either a silo or truck trailers. Emissions are controlled by a fabric filter collector.
EUSILO	Wood waste is routed to a silo from the pneumatic line for storage.

This source has undergone different names in ownership. Prior company names at this facility include Richardson Millwork Company and Menominee River Lumber & Dimension.

#### Emissions

Wood product manufacturing involves the generation of sawdust, planer shavings, and/or sander dust which contribute to levels of atmospheric PM and PM10. Cyclones or baghouses can act as capture/collection systems for air pollution control and product recovery by separating wood residue from the airstream of pneumatic handling systems.

#### Emissions Reporting

The facility is neither a major source for regulated air pollutants nor subject to any federal New Source Performance Standards (NSPS), and thus is not required to report its annual emissions to MAERS.

#### Compliance History

The facility has not received any violation notices in the past five years. The facility was last inspected in 2014 and was found to be in compliance with all applicable air quality rules and regulations at that time.

#### Regulatory Analysis

Component Solutions currently holds PTI No(s). 755-79, 594-91, and 168-93. The facility is considered an area source for hazardous air pollutants (HAP) because the potential to emit of any single HAP is less than 10 tpy and aggregate HAP emissions are less than 25 tpy. The facility is also considered a true minor source for all regulated air pollutants because the facility's potential-to-emit is less than 100 tpy for each regulated air pollutant. EUWOODBOILER is subject to 40 CFR, Part 63, Subpart JJJJJJ – National Emission Standards for Hazardous (NESHAP) Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources with being a biomass fired boiler with a maximum heat input capacity of less than 10 MMBtu/hr at an existing area source. EUWOODBOILER and EUNGBOILER are not subject to 40 CFR part 60, Subpart Dc because the maximum heat input capacity of each is less than 2.9 MW or 9.9 MMBtu/hr.

#### Inspection

On June 12, 2019, I conducted an unannounced inspection at Component Solutions in Menominee, MI. I arrived at the facility and met with the plant manager, Scott Hancock. I explained to Mr. Hancock that the purpose of the inspection was to ensure compliance with Michigan Air Pollution Control Rules.

We began the inspection by touring the facility and observing the different operations. Mr. Hancock pointed out the planing, ripping, and sawing processes at the facility. I was able to observe the duct work for the waste collection system. There appeared to be no leaks inside the facility and all points of saw dust generation had a collection point. We next went outside the plant to observe the baghouse for the pneumatic line and the storage points of the wood waste. At the time of the inspection, the wood waste was being transferred into truck trailers and not the silo. Next, we went into the boiler house for the facility. This area houses the natural gas fired boiler, the wood-fired boiler with a multicyclone, and the wood-boiler feeder. On the way back to the front desk of the facility, I noticed the dry kilns area. Mr. Hancock stated that these kilns are decommissioned and have not been in operation for years. The inspection ended with letting Mr. Hancock know that a follow up email to the inspection will be sent requesting additional information on the pneumatic line baghouse and clarification on permitted equipment.

#### EUPNEUMATICLINE

The pneumatic transfer system is subject to PTI No. 594-91 for the installation and operation of a fabric filter collector for the woodworking processes. The permit was originally for a C.P.E. Model 120 TNFT 361 Arr. I, but this unit has since been replaced with a MAC MPHSPCL baghouse. It should be noted that the conditions of the permit do not explicitly state a specific model of baghouse to be used, but that the process shall not operate unless a dust collector is installed and operating properly. In addition, R 336.1285(2)(d) allows for the replacement of an air pollution control device with an equivalent or more efficient equipment.

The pneumatic line removes wood waste from each woodworking operation and transfers it to one of two collection points, the silo as fuel storage for the wood-fired boiler or truck trailers to be sold as product. The airstream through the pneumatic line is routed through a baghouse that acts as a material collection device and an air pollution control device. Wood residue that funnels to the bin of the baghouse is then routed to the collection points through an enclosed system (SC. 16). The collection system was operating properly with no visible emissions observed from the baghouse exhaust (SC 14 & 15). Mr. Hancock stated that during winter months the baghouse exhaust is routed inside the facility for additional heating.

It was observed, however, there were fugitive dust emissions from the truck trailers. The trailers contained holes in the rear that were allowing wood residue to leak when the trailers were near full. A fugitive dust plan will be requested to ensure the trailers are completely enclosed and do not allow leaks.

#### EUWOODBOILER

PTI No. 168-93 is for a Nordfab Systems wood-fired boiler with multicyclones, rated at a maximum heat input capacity of 9.3 MMBtu/hr. Wood waste from planing operations can be routed to a silo that is used to store fuel for the wood-fired boiler. The wood waste is augured via a conveyor from the bottom of the silo into the boiler. The boiler was originally intended to provide steam for the dry kilns, but the kilns are no longer in operation. Instead, the steam generated is used to heat the facility during winter months. At the time of the inspection, the boiler was not in operation and thus no visible emissions from the stack were observed (SC.16). The boiler exhaust is routed through the multicyclone and Mr. Hancock stated that the control device has been operating properly (SC.18). Mr. Hancock stated that there have been no changes to the stack of the wood-fired boiler and that the diameter is less than 16 inches and the height is no less than 45 feet (SC.19).

In 1992, the boiler room had an internal explosion that destroyed the building and damaged the wood-fired boiler permitted under PTI No. 755-79. The permitted equipment was a Fyr-Feeder automatic wood waste burning system with multicyclone control. This permit has not been voided, but a request will be sent since this equipment is no longer at the source.

**EUNGBOILER**

This emission unit is a Kewanee Classic III natural gas-fired boiler with a maximum heat input capacity of 5.0 MMBtu/hr. The nameplate observed on the boiler states a maximum rating of 150 boiler horsepower or 5.0 MMBtu/hr. The purpose of this emission unit is to provide backup/additional heat to the wood-fired boiler for the facility.

**EUSILO**

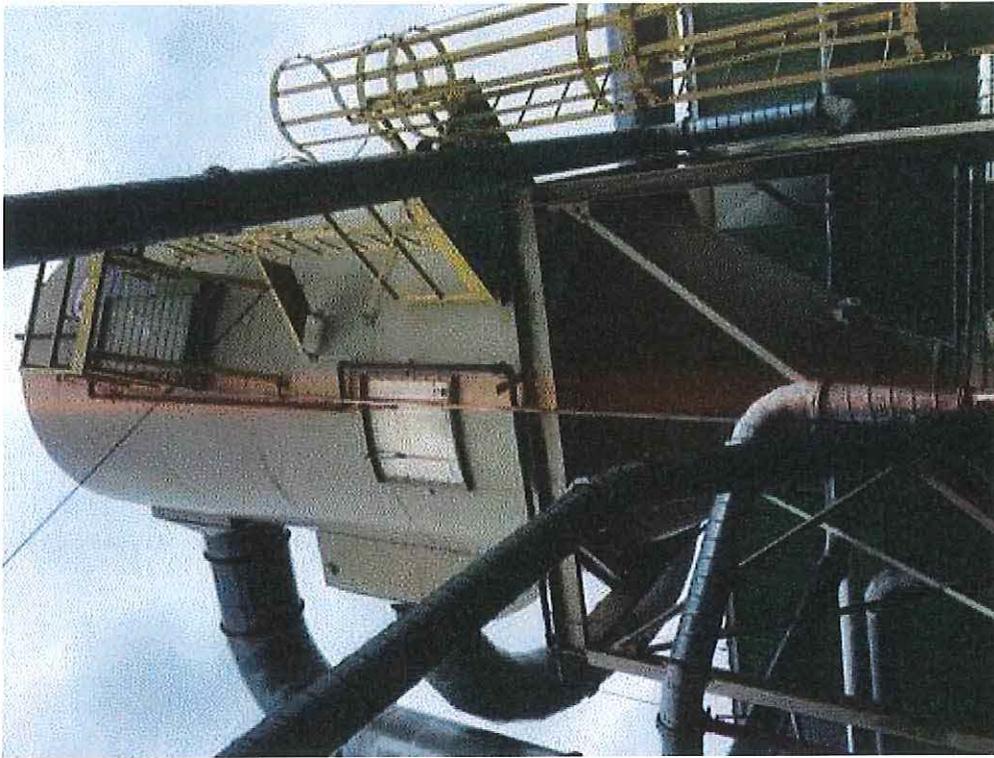
The wood waste silo is filled mechanically via the pneumatic line system. PTI No. 594-91 required a bin vent for the silo to prevent any material escaping while being loaded. Component solutions stated that there is not a bin vent on the silo, but instead there is completely enclosed line that feeds into the top of the silo. It is unknown whether the bin vent for the silo was ever installed, however, there is no introduction of air contaminants coming from the silo with having a completely enclosed system.

The following table lists equipment that is considered to be exempt at the source.

Emission Unit	Description	PTI Exemption
EUNGBOILER	A natural gas-fired boiler with a maximum heat input capacity of 5.0 MMBtu/hr	R 336.1282(2)(b)(i)
EUSILO	A storage container of waste wood residue for boiler fuel.	R 336.1284(2)(m)

**Compliance**

Component Solutions will be requested to submit a fugitive dust plan to ensure no particulate emissions are introduced to the outer air from the collection system. Following the submittal of a fugitive dust plan, Component Solutions will be in compliance with all state air quality rules and federal regulations.



**Image 1(Baghouse) :** Fabric filter collector for woodworking operations.



**Image 2(Truck Trailers) :** Wood residue that is collected from the baghouse is routed to either the truck trailers or the silo in an enclosed system.



**Image 3(Fugitive Dust)** : Fugitive emissions from holes in the truck trailers were observed.



**Image 4(Wood-fired Boiler)** : Wood-fired boiler system.



**Image 5(Multicyclone) :** Multicyclone attached to wood-fired boiler.

NAME Michael Toblin

DATE 7/12/2019

SUPERVISOR EJL